



U.S. Department of Justice

*United States Attorney
Northern District of New York*

100 South Clinton Street

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May 29, 2013

Joseph Vincent Jenkins
Cayuga County Jail
7445 County House Road
Auburn, NY 13021
PRO SE

Re: *United States v. Joseph Vincent Jenkins*
Criminal Case No.: 5:11-CR-602 (GTS)
Discovery

Dear Mr. Jenkins:

Enclosed, please find duplicates of previous disclosures made by the government pursuant to its discovery obligations in the above-captioned matter. The government has refined the inventory included in the government's filing dated May 27, 2103 (Doc. No. 69). That inventory omitted the following records that have been previously disclosed: (1) Northern District of New York Arrest Warrant; (2) Northern District of New York Search Warrant and Application; (3) Affidavit of Special Agent Chad Willard; (4) Update as of 10/18/2010; (5) Google Maps directions; (6) ICE Enforcement Plan; (7) SEACATS report; (8) Canadian Report to Justice; (9) Ontario Police Persons Inquiry. Those previously disclosed records are included in and reflected in the inventory of the present disclosures.

As the below updated inventory reflects, the government has also attached three additional documents: (1) a summary of forensic examination prepared by Ontario Provincial Police Sgt. Michael Harrington; (2) records of your border crossing activity; (3) a map of the point of entry at Landsdowne, Ontario. The only records not included in the present disclosure packet are financial records described in the government's disclosure dated September 7, 2012 and submitted in connection with the government's motion concerning the veracity of your financial affidavit. As the letter submitted to you and included in the present packet at bates nos. 175-76 indicates, these financial records were previously disclosed to you on September 7, 2012. Because these records

relate to a matter independent of the present prosecution, they have not been included in this disclosure, although such disclosure has already been made to you.

UPDATED DISCOVERY INVENTORY

* All items identified in below inventory are included in attached disclosure

Bates Number	Date of Initial Disclosure	Item Disclosed
1-2	10/21/2011	Cover Letter for Discovery dated 10/21/11
3-8	10/21/2011	ICE Enforcement Operation Plan
9-10	10/21/2011	Google Maps Directions
11-14	10/21/2011	DHS ICE Report dated 10/11/11
15-18	10/21/2011	DHS ICE Report dated 8/22/2011
19-22	10/21/2011	DHS ICE Report dated 7/8/2011
23-26	10/21/2011	DHS ICE report dated 4/7/2011
27	10/21/2011	NDNY Arrest Warrant
28-33	10/21/2011	NDNY Search Warrant
34-65	10/21/2011	Application for NDNY Search Warrant
66-70	10/21/2011	ICE Forensic Examination Report
71-73	10/21/2011	DHS ICE Report dated 10/7/2011
74-76	10/21/2011	DHS ICE Report dated 9/27/2011
77-79	10/21/2011	DHS ICE Report dated 9/22/2011
80-83	10/21/2011	Custody and Property Receipts w/ index nos. 3563259, 3563260, 3563261
83-87	10/21/2011	SEACATS Report
88-90	10/21/2011	Custody and Property Receipts w/ index nos. 3563259, 3563260, 3563261
91-93	10/21/2011	DHS ICE Report dated 9/10/2010
94-99	10/21/2011	DHS ICE Report dated 5/26/2009
100	10/21/2011	Canadian Bench Warrant Issued by J.D.G. Waugh on 10/18/2010

101	10/21/2011	Canadian Evidence Inventory (seizure receipt) and Ontario Province Police Query
102-3	10/21/2011	Canadian Information to Obtain a Search Warrant
104	10/21/2011	Canadian Property Report
105-36	10/21/2011	Canadian Warrant to Search + Appendices A, B, C
137	10/21/2011	Canadian Property Seizure Report
138-41	10/21/2011	Ontario Police Persons Inquiry
142-69	10/21/2011	C4P Forensic Computer examination conducted by Canadian law enforcement
170-71	10/21/2011	Canadian Report to Justice
172-74	10/21/2011	Canadian Order of Disposition of Items Seized
175-76	9/7/2012	Cover Letter re: Discovery dated 9/27/12
177-78	9/7/2012	Canadian Update as of 10/18/2010
179-80	9/7/2012	Canadian Prosecutor's Information Sheet
181-83	9/7/2012	DHS ICE Report dated 10/21/2011
184-86	9/7/2012	DHS ICE Report dated 5/29/2012
187-189	9/7/2012	DHS ICE Report dated 5/29/2012
190-96	5/29/2013	Canadian Summary of Forensic Findings
197-206	5/29/2013	DHS Requests, Certification and Border Crossing Records
207-209	3/15/2012	DHS Second Supplemental Forensic Examination report
210-12	5/29/2013	Cayuga County Sheriff's Office Visitor Log
213	5/29/2013	Landsdowne Point of Entry Map
214-217	7/23/2012	Will Say Statement of Tristan Garrah
218-221	7/23/2012	Will Say Statement of Glen Hache
222-23	7/23/2012	Will Say Statement of Melany Boyd
224-26	7/23/2012	Will Say Statement of Jarrett Johnston

227-29	7/23/2012	Will Say Statement of Marie-Josée Vinette
230-33	7/23/2012	Affidavit of Special Agent Chad Willard

Respectfully,

RICHARD S. HARTUNIAN
United States Attorney

By: */s/ Gwendolyn E. Carroll*
Gwendolyn E. Carroll
Assistant United States Attorney
Bar Roll No. 515777

CC: Joseph Jenkins
Tamara Thomson, AUSA

Enclosures